

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 24-CR-20202-RUIZ**

**UNITED STATES OF AMERICA**

**v.**

**DORIAN VELASQUEZ,**

**Defendant.**

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**FACTUAL PROFFER**

The United States and the Defendant, Dorian Velasquez (“VELASQUEZ”), stipulate that if this case were to proceed to trial, the United States would prove the following facts, among others, beyond a reasonable doubt:

VELASQUEZ is a naturalized United States citizen originally from Guatemala. On April 11, 2014, VELASQUEZ submitted his Naturalization Application (United States Citizenship and Immigration (“USCIS”) Form N-400) (“the Application”). The Application VELASQUEZ completed asked, “Have you EVER committed, assisted in committing, or attempted to commit, a crime or offense for which you were NOT arrested?” VELASQUEZ answered, “No” to this question. VELASQUEZ completed the Application under penalty of perjury and certified that all information contained therein was complete, true, and accurate.

VELASQUEZ was interviewed, under oath, on July 24, 2014, by a USCIS Officer. Red marks on the application confirm that the officer verified VELASQUEZ’s answers during the USCIS interview. During this interview, VELASQUEZ again affirmed under the penalty of perjury that the Application was complete, true, and correct. VELASQUEZ’s Application was approved on the same day as his interview.

VELASQUEZ was naturalized as a United States citizen after taking the Oath at the Naturalization Oath Ceremony on July 25, 2014.

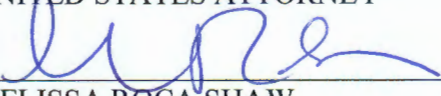
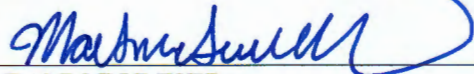

On May 1, 2017, VELASQUEZ was charged by the State of Florida with six felony counts and one misdemeanor count, including four counts of Lewd and Lascivious Molestation on a Child 12-16 years old; two counts of Sexual Activity with child by person in Familial or Custodial Authority; and one charge of battery. This unlawful conduct occurred between July 19, 2011, and July 19, 2012, and between July 19, 2013, and July 19, 2015. In October 2019, VELASQUEZ pled guilty to the four counts of L&L Molestation on a Child.

A Senior Fingerprint Specialist with Homeland Security Investigations (“HSI”) compared VELASQUEZ’s fingerprints from the Application against his fingerprints from the state file and confirmed it is the same individual.

The Defendant did not disclose any information regarding the molestation in 2011, 2012, 2013, and 2015, a fact which would have justified USCIS denying naturalization, or would predictably have led to other facts warranting that result.

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The United States and VELASQUEZ agree that these facts, which do not include all of the facts known to the United States and to VELASQUEZ, are sufficient to prove beyond a reasonable doubt that VELASQUEZ committed the crime of Procurement of Citizenship or Naturalization Unlawfully, in violation of Title 18, United States Code, Section 1425(a).

Date: <u>8/29/24</u>	MARKENZY LAPOINTE UNITED STATES ATTORNEY 
	By: MELISSA ROCA SHAW SPECIAL ASSISTANT UNITED STATES ATTORNEY
Date: <u>8/29/24</u>	
	MAEANN DUNKER ATTORNEY FOR DEFENDANT
Date: <u>8/29/24</u>	
	By: DORIAN VELASQUEZ DEFENDANT